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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Adali Arnulfo Escalante-Trujillo,

Defendant.

2:20-cr-00156-RFB-DJA

**Stipulation for a Protective Order
Pertaining to Specific Discovery**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendant, Adali Arnulfo Escalante-Trujillo, the public, or any third party not directly related to this case, any and all discovery from Confidential Informant (CI) files. The parties state as follows:

1. On July 8, 2020, a Federal Grand Jury returned a twenty-one count indictment charging Escalante-Trujillo, along with twelve other codefendants, with offenses pertaining to narcotics sales and firearm offenses. ECF Doc. 1. Defendant had his initial appearance and arraignment on July 15, 2020. ECF Doc. 34. Escalante-Trujillo is set for trial on October 30, 2023.

2. Following an ex parte, in camera review of Confidential Informant files, the

1 Court has stated that the Court will issue orders regarding what shall be disclosed from
2 those files. All discovery produced from CI files pursuant to those orders (“Protected
3 Material”) is covered by this Protective Order.

4 3. Because of the nature of the Protected Material, the parties intend to restrict
5 access to the Protected Material in this case to the following individuals: the prosecution
6 team, attorney(s) of record for Escalante-Trujillo, and personnel that are necessary to assist
7 in performing the attorneys’ duties in the prosecution or defense of this case, including
8 investigators, legal assistants, paralegals, and any individuals specifically authorized by the
9 Court (collectively, the “Covered Individuals”). Escalante-Trujillo shall not review or obtain
10 a copy of the Protected Material. Counsel may not discuss any identifying information with
Escalante-Trujillo.

11 4. Without leave of Court, the Covered Individuals shall not:

- 12 a. make copies for, or allow copies of any kind to be made by any other
13 person of the Protected Material in this case or permit dissemination of
14 the Protected Material at the Southern Nevada Detention Center jail
15 facility, or any other detention facility where Escalante-Trujillo is housed,
16 to include leaving a copy of the Protected Material at any detention
17 facility where Escalante-Trujillo is housed;
- 18 b. allow any other person to read, watch, listen, or otherwise review the
19 Protected Material;
- 20 c. use the Protected Material for any other purpose other than preparing to
21 defend against or prosecute the charges in the indictment or any further
22 superseding indictment arising out of this case; or
- 23 d. attach the Protected Material to any of the pleadings, briefs, or other court
24 filings except to the extent those pleadings, briefs, or filings are filed under
seal.

5. Nothing in this stipulation is intended to restrict the parties’ use or introduction

1 of the Protected Material as evidence at trial or support in motion practice. As Escalante-
2 Trujillo proceeds to trial or any evidentiary hearing, the parties will confer to determine
3 whether it will be necessary to revisit the terms of this Protective Order.

4 6. If the parties agree, with written Government consent, that certain portions of
5 the Protected Material may be shared with Escalante-Trujillo, the parties may do so without
6 seeking leave of court.

7 7. The parties shall inform any person to whom disclosure may be made
8 pursuant to this order of the existence and terms of this Court's order.

9 8. The defense hereby stipulates to this protective order.

10 Respectfully submitted this 25th day of July, 2023.

11 JASON M. FRIERSON
United States Attorney

12 s/ Jacob H. Operskalski
13 JACOB H. OPERSKALSKI
Assistant United States Attorney

14 Maysoun Fletcher
15 MAYSOUN FLETCHER
16 COUNSEL FOR ADALI ARNULFO
17 ESCALANTE-TRUJILLO

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19 IT IS SO ORDERED this the 27th day of July, 2023.

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23 UNITED STATES DISTRICT JUDGE
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